


Meeting the Child and Adult Care Food Program (CACFP) Meal Patterns for Children

Module 7: Grains Component
Part B – Whole Grain-rich Requirement




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Bureau of Health/Nutrition, Family Services and Adult Education

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Module 7 Topics

Requirements for Grains Component	Covered in
1. Crediting	Part A
2. Whole grain-rich (WGR)	Part B
3. Ounce equivalents	Part C



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Bite Size Training Modules

- Module 1 Introduction and Meal Pattern Overview
- Module 2 Meal Pattern Documentation
- Module 3 Milk Component
- Module 4 Meat/Meat Alternates Component
- Module 5 Fruits Component
- Module 6 Vegetables Component
- Module 7 Part A: Grains Component – Crediting
Part B: Grains Component – Whole Grain-rich
Part C: Grains Component – Ounce Equivalents
- Module 8 Menu Planning

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize>

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Key Points About WGR Requirements for Grains

- At least one serving of grains per day must be WGR
- Different WGR criteria for different categories of grain foods
- Six methods to determine if foods are WGR
- Rule of Three is most common method to determine if commercial foods are WGR

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WGR Requirement

- At least **one serving** of WGR grains per day
- May serve WGR food at **any** meal or snack
- If different groups of children at each meal, **only one meal is** required to contain WGR food



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WGR Requirement

- USDA recommends varying which meals and snacks include WGR foods





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USDA CACFP Best Practices

Provide at least two servings of WGR grains per day

https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_factBP.pdf

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Menu Planning Considerations

If CACFP facility serves	Requirement
<i>More than one</i> meal per day (breakfast, lunch, or supper)	▶ At least one grain must be WGR
<i>Only one meal</i> per day (breakfast, lunch, or supper)	▶ Grain must be WGR
<i>Only breakfast</i> and substitutes MMA for grains component	▶ WGR grain not required
<i>Only snack</i> and offers a grain as one of the two snack components	▶ Grain must be WGR


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Menu Documentation

■ CACFP menus must *document* when grain is WGR

- Whole-wheat bread
- Whole grain-rich English muffin
- Pasta (WGR)
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Different WGR Criteria

- Breakfast cereals
- Commercial grain products
- Commercial combination foods
- Grain foods made from scratch




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Different WGR Criteria

- Breakfast cereals
- Commercial grain products
- Commercial combination foods
- Grain foods made from scratch




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Three WGR Criteria for RTE Breakfast Cereals

1. First ingredient must be *whole grain*
2. Must be *fortified*
3. *Sugar limit*: Cannot exceed 6 grams of sugars per ounce



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Identifying Fortified Breakfast Cereals

- “Fortified” is listed on the product label **OR**
- Product’s ingredients statement includes names of added vitamins and minerals

Ingredients: Whole Grain Oats, Whole Grain Corn, Sugar, Corn Starch, Corn Bran, Whole Grain Rice, Whole Grain Sorghum, Whole Grain Millet, Brown Sugar Syrup, Salt, Tripotassium Phosphate, Color (caramel color and annatto extract), Vitamin E (mixed tocopherols) Added to Preserve Freshness.

Vitamins and Minerals: Calcium Carbonate, Zinc and Iron (mineral nutrients), A B Vitamin (niacinamide), A B Vitamin (calcium pantothenate), Vitamin C (sodium ascorbate), Vitamin B₆ (pyridoxine hydrochloride), Vitamin B₂ (riboflavin), Vitamin B₁ (thiamin mononitrate), A B Vitamin (folic acid), Vitamin A (palmitate), Vitamin B₁₂, Vitamin D₃.




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Two WGR Criteria for Hot Breakfast Cereals

1. Must meet USDA’s *Rule of Three* WGR criteria
2. *Sugar limit*: Cannot exceed 6 grams of sugars per ounce




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Different WGR Criteria

- Breakfast cereals
- Commercial grain products
- Commercial combination foods
- Grain foods made from scratch




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WGR Criteria for Commercial Grain Products

1. At least *half* of grains must be whole grains
2. Any other grain ingredients must be *enriched, bran, or germ*




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WGR Criteria for Commercial Combination Foods

WGR requirements apply only to *grain portion*

1. At least half of the grains in the *grain portion* must be whole grains
2. Any other grain ingredients in the *grain portion* must be enriched, bran, or germ




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Different WGR Criteria

- Breakfast cereals
- Commercial grain products
- Commercial combination foods
- Grain foods made from scratch




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WGR Criteria for Foods Made from Scratch

Amount of whole grains must be *equal to or more* than combined amount of enriched grains, bran, and germ



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6 Methods to Identify WGR Foods

Method	Applies to	
	Commercial products	Foods made from scratch
1. Rule of Three	X	
2. WIC Whole-Grain Foods List	X	
3. Documentation	X	X
4. WGR criteria for National School Lunch Program (NSLP) and School Breakfast Program (SBP)	X	X
5. Food and Drug Administration (FDA) Whole Grain Health Claim	X	
6. Labels for whole-wheat foods with FDA Standard of Identity	X	


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6 Methods to Identify WGR Foods

Method 1: Rule of Three (commercial products only)

1. First ingredient is a *whole grain* (excluding water)
2. Second grain ingredient (if any) is *creditable*
3. Third grain ingredient (if any) is *creditable*



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6 Methods to Identify WGR Foods

Method 1: Rule of Three (commercial products only)

Most common

1. First ingredient is a *whole grain* (excluding water)
2. Second grain ingredient (if any) is *creditable*
3. Third grain ingredient (if any) is *creditable*

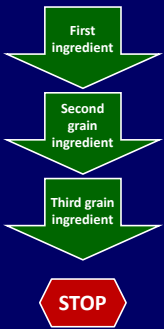


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Considerations for Rule of Three

- Do not need to look at any other grains *after* first three grain ingredients
- Noncreditable grains cannot be one of *first three* grain ingredients



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Examples of Noncreditable Grains

Barley malt	Grits, e.g., barley grits, corn grits, and durum grits	Soluble corn fiber
Bleached flour	Malted barley flour	Soy products, e.g., soy fiber, soy flakes and soy grits
Bromated flour	Milled corn	Stone-ground corn
Coconut flour	Nut/seed flour, e.g., almond flour, flaxseed meal, hazelnut meal, and sunflower seed flour	Stone-ground corn flour
Corn	Oat fiber	Vegetable and legume flours, e.g., chickpea flour, fava bean flour, pea flour, potato flour, and soy flour
Corn fiber	Oat hull fiber	Wheat flakes
Corn flour	Potato flour	Wheat flour
Cornmeal	Rice flour	White flour
Degermed corn	Rye flour	Yellow corn flour
Degerminated corn meal	Semolina	Yellow corn meal
Durum flour	Semolina flour	
Farina		
Fermented wheat		
Fermented wheat flour		

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/WGR_Requirement_CACFP.pdf

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4 Situations to Ignore Noncreditable Grains for Rule of Three

1. Listed after "contains 2% or less"
2. Listed in the sublisting for a dough conditioner
3. Listed in the non-grain portion of combination food
4. Listed in a non-grain ingredient

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1 Ignore Noncreditable Grains After "Contains 2% or less"

Ingredients: Whole wheat flour, sugar, eggs, water, enriched flour (flour, malted barley flour, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid), soybean oil, contains 2% or less of: oat fiber, cornmeal, leavening (baking soda, sodium aluminum phosphate, monocalcium phosphate), salt

Noncreditable grains

WGR

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2 Ignore Noncreditable Grains in Dough Conditioners

Ingredients: Whole wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzyme, folic acid), water, brown sugar, corn oil, dough conditioner (wheat flour, salt, soybean oil, ascorbic acid), yeast, salt, enzyme

Noncreditable grain

WGR

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3 Ignore Noncreditable Grains in Non-grain Portion of Combination Food

Ingredients: Chicken, water, salt, wheat flour, and natural flavor. Breaded with: whole wheat flour, water, enriched flour, salt, and spices

Noncreditable grain

WGR

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4 Ignore Noncreditable Grains in Non-grain Ingredient

Ingredients: Whole wheat flour, sugar, corn oil, filling: corn syrup evaporated apples, cinnamon, lemon juice, wheat flour, salt.

Non-grain ingredient

Noncreditable grain


WGR

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Other Ingredients to Ignore for Rule of Three

Cellulose fiber	Tapioca starch
Corn dextrin	Wheat gluten
Corn starch	Wheat starch
Maltodextrin	Any ingredients after the phrase, "Contains 2% or less of..."
Modified food starch	
Rice starch	



More examples: Meeting the Whole Grain-rich Requirement for the CACFP
https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/WGR_Requirement_CACFP.pdf

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Evaluating Flour Blends for Rule of Three

- Treat flour blends as *one* grain ingredient
- If flour blend is *first* grain ingredient, it must contain *only whole grains*

Example 1: WGR	Example 2: Not WGR
Ingredients: ① Flour blend (whole wheat flour, whole grain oat flour), water, ② enriched wheat flour, yeast, salt	Ingredients: ① Flour blend (whole wheat flour, enriched flour), water, yeast, salt

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Evaluating Flour Blends for Rule of Three

- If flour blend is *second or third* grain ingredient, it may contain *any creditable grains*

Example 1: WGR	Example 2: WGR
Ingredients: ① Whole wheat flour, ② Whole grain flour blend (whole wheat flour, whole grain oat flour), yeast, salt	Ingredients: ① Whole wheat flour, water, ② flour blend (whole wheat flour, enriched flour), water, yeast, salt

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Evaluating Flour Blends for Rule of Three

- If the flour blend includes any *noncreditable grains*, it is not a creditable grain

Example: Not WGR

Ingredients: ① Flour blend (durum flour, bromated flour, brown rice flour), water, salt.

Noncreditable grains

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6 Methods to Identify WGR Foods

Method 2: WIC Lists (commercial products only)

Listed on any state's *WIC-approved food list*

- Includes tortillas, pasta, rice, and bread
- Not all WIC-approved breakfast cereals are WGR so must be marked as whole grain



<https://portal.ct.gov/DPH/WIC/Approved-Food-Guide>

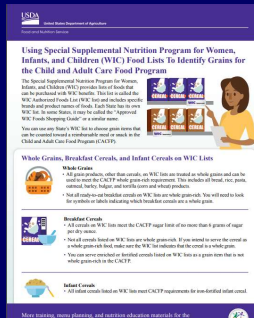
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USDA Resource

Webpage: Using the WIC Food Lists to Identify Grains for the CACFP

- Handouts, training slides, and webinars in English and Spanish



<https://www.fns.usda.gov/tn/using-wic-food-lists-identify-grains-cacfp>

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6 Methods to Identify WGR Foods

Method 3: Documentation (commercial products and foods made from scratch)

Documentation indicates that whole grains are *primary grain ingredient*

- **Commercial products:** Child Nutrition (CN) label or product formulation statement (PFS)
- **Foods made from scratch:** Recipe indicates amount of all whole grains is \geq amount of all other creditable grains

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Other Documentation Considerations for Commercial Products

- Whole grain is *not* first ingredient but contains multiple whole grains

Ingredients: Water, ① unbleached enriched wheat flour [flour, malted barley flour, reduced iron, niacin, thiamin mononitrate (vitamin B1), riboflavin (vitamin B2), folic acid], ② whole wheat flour, ③ whole oats, sugar, wheat gluten, yeast, soybean oil, salt, monoglycerides, datem, citric acid, calcium carbonate, soy lecithin, whey, nonfat milk

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CSDE Resource

Using Product Formulation Statements in the CACFP

- Required information
- Reviewing PFS
- Resources

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/PFScacfp.pdf>

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Documentation for WGR Foods Made from Scratch

- Must have recipes on file
- Review *amount (weight or volume)* of each grain ingredient
- If recipe lists grain ingredients in *different units* of measure, must convert to *same unit* of measure

<https://www.fns.usda.gov/tn/my-recipe-whole-grain-rich-cacfp>

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Example of Recipe Documentation

Blueberry Oatmeal Muffins

- 2 cups whole-wheat flour
- 2 cups enriched flour
- 2½ cups oatmeal

WGR

1. Add amount of whole grains	4½ cups
2. Add amount of other creditable grains	2 cups
3. Are whole grains ≥ other creditable grains?	Yes

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USDA Resource

Is My Recipe Whole Grain-Rich in the CACFP?

- How to evaluate recipe for WGR compliance
- English and Spanish

<https://www.fns.usda.gov/tn/my-recipe-whole-grain-rich-cacfp>

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6 Methods to Identify WGR Foods

Method 4: Meets WGR Criteria for Schools (commercial products and foods made from scratch)

Meets the *WGR criteria for school meals* in the National School Lunch Program (NSLP) and School Breakfast Program (SBP)

- Excludes WGR grain-based desserts

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6 Methods to Identify WGR Foods

Method 5: FDA Whole Grain Health Claim (commercial products only)

Package has one of the two *whole-grain health claim statements* from the FDA

"Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol, may reduce the risk of heart disease and some cancers."

"Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease."

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6 Methods to Identify WGR Foods

Method 6: Labels for foods with FDA Standard of Identity (commercial products only)

Labeled as *"whole wheat," "entire wheat," or "graham"* (FDA Standard of Identity)

- Only certain breads and pasta products

- Whole wheat bread, rolls, and buns
- Entire wheat bread, rolls, and buns
- Graham bread, rolls, and buns (not graham crackers)
- Whole wheat spaghetti, vermicelli, macaroni, and macaroni products



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Labels that cannot be used to indicate if food is WGR

1. Products labeled "whole grain" or "whole wheat" (without FDA Standard of Identity)
2. Whole Grain Stamp
3. Certain labeling terms (without FDA Standard of Identity)

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Labels that cannot be used to indicate if food is WGR

1. Products labeled "whole grain" or "whole wheat"



Must use a different method to evaluate if product is WGR

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Labels that cannot be used to indicate if food is WGR

2. Whole Grain Stamp



Must use a different method to evaluate if product is WGR


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Labels that cannot be used to indicate if food is WGR

3. Certain labeling terms (foods without FDA Standard of Identity)

- Whole grain
- Made with whole grains
- Made with whole wheat
- Contains whole grains
- Multi-grain or specifies number of grains, e.g., "7-grain bread"



Must use a different method to evaluate if product is WGR

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More Resources



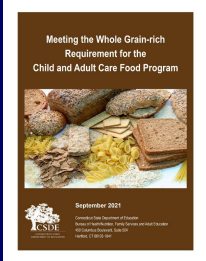
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CSDE Resource

Meeting the Whole Grain-rich Requirement for the CACFP

- Explains WGR criteria and required documentation
- Menu planning considerations
- How to evaluate foods
- How to evaluate PFS for commercial products



https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/WGR_Requirement_CACFP.pdf

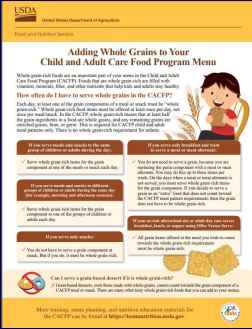
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USDA Resource

Webpage: Adding Whole Grains to Your CACFP Menu

- Handouts, training slides, and webinars in English and Spanish



<https://www.fns.usda.gov/tn/adding-whole-grains-your-cacfp-menu>

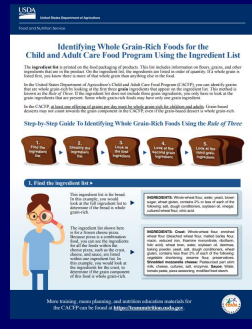
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USDA Resource

Webpage: Identifying Whole Grain-rich Foods for the CACFP

- Handouts and webinars in English and Spanish



<https://www.fns.usda.gov/tn/identifying-whole-grain-rich-foods-cacfp>

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Test it Out! Using the Rule of Three for Commercial Products

- First ingredient is a **whole grain** (excluding water)
- Second grain ingredient (if any) is **creditable**
- Third grain ingredient (if any) is **creditable**

Green = Creditable grains

Red = Noncreditable grains

Blue = Grain ingredients to ignore


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Example 1: Whole-wheat Bagel

Ingredients: ① Whole wheat flour, sugar, **wheat-gluten**.
Contains 2% or less of each of the following: honey, salt, **yellow-corn-flour**, yeast, molasses, diacetyl tartaric acid esters of mono-diglycerides (datem), ascorbic acid, mono-and diglycerides, l-cysteine, enzymes

Rule of Three criteria	Ingredient	Complies?
First ingredient must be whole grain	Whole wheat flour	Yes
Second grain ingredient must be creditable	None	
Third grain ingredient must be creditable	None	



WGR

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Example 2: Bread Sticks

Ingredients: Water, ① whole wheat flour, ② unbleached unbromated enriched wheat flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzymes, folic acid), honey, yeast, salt, dough conditioners (mono & diglycerides, DATEM, l-cysteine, ascorbic acid, enzymes), **modified food starch**, ③ fava bean flour, malted barley flour, dextrose, rye flour

Not WGR

Rule of Three criteria	Ingredient	Complies?
First ingredient must be <i>whole grain</i>	Whole wheat flour	Yes
Second grain ingredient must be <i>creditable</i>	Unbleached unbromated enriched flour	Yes
Third grain ingredient must be <i>creditable</i>	Fava bean flour (noncreditable)	No

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Example 3: Oat Bread

Ingredients: Water, ① unbleached enriched wheat flour [flour, malted barley flour, reduced iron, niacin, thiamine mononitrate (vitamin B1), riboflavin (vitamin B2), folic acid], water, whole wheat flour, whole oats, sugar, yeast, soybean oil, salt, calcium sulfate, citric acid, calcium carbonate, soy lecithin, whey, nonfat milk

Rule of Three criteria	Ingredient	Complies?
First ingredient must be <i>whole grain</i>	Unbleached enriched flour	No
Second grain ingredient must be <i>creditable</i>		
Third grain ingredient must be <i>creditable</i>		

Not WGR

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Example 3: Oat Bread

Ingredients: Water, ① unbleached enriched wheat flour [flour, malted barley flour, reduced iron, niacin, thiamine mononitrate (vitamin B1), riboflavin (vitamin B2), folic acid], water, ② whole wheat flour, ③ whole oats, sugar, yeast, soybean oil, salt, calcium sulfate, citric acid, calcium carbonate, soy lecithin, whey, nonfat milk

Rule of Three criteria	Ingredient	Complies?
First ingredient must be <i>whole grain</i>	Unbleached enriched flour	No
Second grain ingredient must be <i>creditable</i>	Whole wheat flour	Yes *
Third grain ingredient must be <i>creditable</i>	Whole oats	Yes *

* Might be WGR using Method 3: Documentation

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Example 4: Cheese Ravioli

Ingredients: **Filling:** Fat-free ricotta cheese (whey, skim milk, vinegar, carrageenan), water, egg, low-moisture part skim mozzarella cheese (cultured part skim milk, salt, enzymes), whey protein isolate, sodium caseinate, bleached wheat flour, salt, sugar, dehydrated garlic. **Pasta:** ① Whole wheat flour, ② enriched durum wheat flour (wheat flour, niacin, ferrous sulfate, thiamine mononitrate, riboflavin, folic acid), water, egg

Rule of Three criteria	Ingredient	Complies?
First ingredient must be <i>whole grain</i>	Whole wheat flour	Yes
Second grain ingredient must be <i>creditable</i>	Enriched durum wheat flour	Yes
Third grain ingredient must be <i>creditable</i>	None	

WGR

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Example 5: Wheat roll

Ingredients: Water, ① **Flour blend** [whole wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzyme, folic acid)], brown sugar, corn oil, dough conditioner (soybean oil, vegetable glycerides, soy flakes), yeast, salt, wheat gluten, enzyme

Rule of Three criteria	Ingredient	Complies?
First ingredient must be <i>whole grain</i>	Flour blend (whole-wheat flour and enriched flour)	No *
Second grain ingredient must be <i>creditable</i>		
Third grain ingredient must be <i>creditable</i>		

Not WGR

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Example 5: Wheat roll

Ingredients: Water, ① **Flour blend** [whole wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzyme, folic acid)], brown sugar, corn oil, dough conditioner (soybean oil, vegetable glycerides, soy flakes), yeast, salt, wheat gluten, enzyme

Rule of Three criteria	Ingredient	Complies?
First ingredient must be <i>whole grain</i>	Flour blend (whole-wheat flour and enriched flour)	No *
Second grain ingredient must be <i>creditable</i>		
Third grain ingredient must be <i>creditable</i>		

- At least 8 grams per ounce equivalent
- Whole grain > first ingredient after flour blend


* Could be WGR using Method 3: Documentation

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**USDA Memo COVID-19:
Child Nutrition
Response #91**

*Nationwide Waiver to
Allow Specific Meal
Pattern Flexibility in the
CACFP for School Year
2021-2022*



<https://www.fns.usda.gov/cn/child-nutrition-response-91>

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**USDA Memo COVID-19:
Child Nutrition Response #91**

- Allows states to approve requests from CACFP sponsors to waive three meal pattern requirements
 - *at least one serving per day must be WGR*
 - crediting of grains by ounce equivalents must be fully implemented by October 1, 2021
 - low-fat milk (1%) must be unflavored

<https://portal.ct.gov/SDE/Nutrition/Operating-Child-Nutrition-Programs-during-COVID-19-Outbreaks/How-To>

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**USDA Memo COVID-19:
Child Nutrition Response #91**

- Must apply to the CSDE
- If approved, WGR waiver is valid for *July 1, 2021, through June 30, 2022*
- Without CSDE-approved waiver, CACFP menus must meet the WGR requirement

<https://portal.ct.gov/SDE/Nutrition/Operating-Child-Nutrition-Programs-during-COVID-19-Outbreaks/How-To>

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<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize>

<https://portal.ct.gov/SDE/Nutrition/CACFP-Contact>

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Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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